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ATTACHMENT 2

ATTACHMENT 2

AFFIDAVIT OF DANA GREENO,
CHIEF TECHNOLOGY OFFICER OF
AVENTURE COMMUNICATIONS TECHNOLOGY, LLC

CITY OF SIOUX CITY   )
) ss:

STATE OF IOWA   )

Dana Greeno, being duly sworn, hereby deposes and says as follows:

1. I am Dana Greeno, the Chief Technical Officer of Aventure Communications Technology, LLC. I make this statement based on my personal knowledge of the facts set forth herein.

2. I have Thirty years of Telecom experience.

3. I caused the Call Detail Records cited in Illustration 1 of the attached Aventure Comments to be generated. It reflects the calls routed to Aventure by Qwest over the same Qwest local trunk during the month of March 2011.

4. I traced the phone number listed in the CN field, and determined that it was assigned to McLeod USA, which has been acquired by PaeTec.

5. The analysis of the CDR found in Section II(a) of the Aventure Comments is mine.

6. The full Call Detail Records contain 95 pages of records. We have attached the first 10 pages as an Attachment to these Comments. These first 10 pages show repeatedly that the McLeod/PaeTec tandem number has been inserted into the CN field in almost all of the calls reflected in the CDR pages. The first 10 pages of the CDR are typical of the remaining 85 pages.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing paper are true.
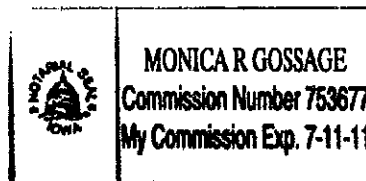

Dana Greeno

Dana Greeno

Sworn to before me this
_3/st_ day of March, 2011.

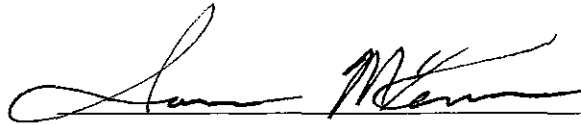_Monica R Gossage_

Notary Public

My Commission expires: _7- //- //_

MONICA R GOSSAGE
Commission Number 753677
My Commission Exp. 7-11-11

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ATTACHMENT 3

AFFIDAVIT OF JAMES MCKENNA,
PRESIDENT OF AVENTURE COMMUNICATIONS TECHNOLOGY, LLC

CITY OF SIOUX CITY   )
) ss:
STATE OF IOWA   )

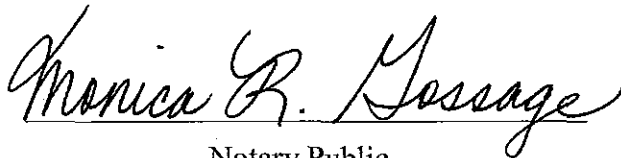James McKenna, being duly sworn, hereby deposes and says as follows:

1. I am Jim McKenna, President of Aventure Communications Technology, LLC. I make this statement based on my personal knowledge of the facts set forth herein.

2. I have Forty One years of Telecom experience.

3. I and my family live in Salix, Iowa. My home phone is a landline phone, and Aventure is my long distance carrier.

4. I have friends who live in Onawa, Iowa, which is a town several miles away. Salix is in a different exchange from Onawa, however, calls between the two towns are billed at intrastate toll rates.

5. Last year, I received several telephone calls to my wireline home phone with Phoenix numbers displayed on the Caller ID display. I later found that these calls originated from my friend who lives in Onawa, Iowa.

6. As a telecom professional, I can think of no legitimate reason why a call originating in Onawa, Iowa, and destined to Salix, Iowa, would be routed through Phoenix, Arizona.

7. The only rational that I can assign to such a routing decision is that Qwest wished to evade paying intrastate access charges, which are significantly higher than interstate access charges.

8. I believe that Qwest accomplished this access charge evasion by routing the call through multiple tandems so that the tandems would generate additional SS7 data, and replace the original CPN data. Presumably, when the call was passed through Qwest's Phoenix tandem, it populated the CPN field with the number assigned to the Phoenix tandem office, and so displayed as a Phoenix call on my Caller ID.

9. As a telecom professional, I know that highly unusual routing patterns like this do not happen by accident. Networks are designed to be efficient, and under normal circumstances, the calls from Onawa to Salix would not have left the state. For such a call to take an exotic routing path, such as through a Phoenix tandem, the call had to be purposely directed, and technicians had to overrule the normal routing patterns and assign a new path.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing paper are true.
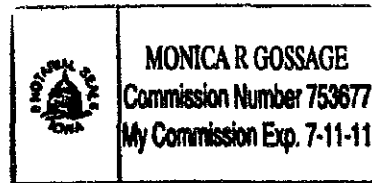
James McKenna

Sworn to before me this
_31st_ day of March, 2011.

Monica R. Gossage
Notary Public

My Commission expires: _7 - 11 - 11_

MONICA R GOSSAGE
Commission Number 753677
My Commission Exp. 7-11-11

ATTACHMENT 4

AFFIDAVIT OF BRADLEY CHAPMAN,
CHIEF FINANCIAL OFFICER OF
AVENTURE COMMUNICATIONS TECHNOLOGY, LLC
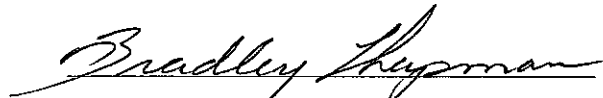
CITY OF SIOUX CITY   )
) ss:
STATE OF IOWA   )

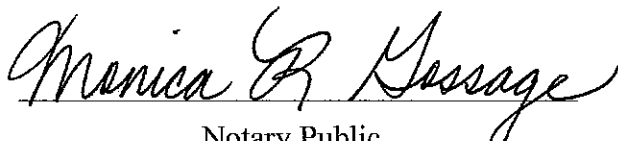Bradley Chapman, being duly sworn, hereby deposes and says as follows:

1. I am Bradley Chapman, the Chief Financial Officer of Aventure Communications Technology, LLC. I make this statement based on my personal knowledge of the facts set forth herein.

2. I live in Laurel, Nebraska, serviced by Qwest. My wife does daycare for a living and has kids that live in different towns. In approx Feb/Mar of 2010, every time that my wife would call one of her parents in a Concord, NE, serviced by a different ILEC, the quality of the phone call would be terrible. The parents said that they had noticed this any time they talked to anyone in Laurel that the quality of the calls was this bad. They had called their service technician from the ILEC and he had been out a couple of times and not found anything wrong. When they told him that it was when they call Laurel he asked if my wife could help determine the issue. She would call to their house and the technician would listen to the call and notice that there definitely was an issue. After a couple of calls they had noticed that the caller id for these calls had a different number. This number was traced to Miami, FL and belonged to a T-Mobile customer. The technician told her that Qwest was doing "least cost routing" and taking an intrastate call and making it an interstate call for "access avoidance". The technician advised my wife to put a trouble ticket in with Qwest.

3. My wife contacted Qwest, which denied that any misrouting or changes to Caller ID were taking place. When she discussed this with them, they tried to tell her that she did not make any calls during this time. They could not find in their records that any calls from our number went to our daycare parents' number. These were the same calls that were made when the technician was there.

4. Because of Qwest's failure to address our complaints, I filed a complaint with the Nebraska Public Service Commission ("PSC"), because our home is located in Nebraska and the Nebraska PSC has jurisdiction over the calls at issue. I made that complaint electronically on the PSC's website, and do not have a copy of the complaint.

5. We also called Qwest and told the service representative that we were making such a complaint. In response to the threat of a complaint, Qwest called our house and told my wife that they discovered a "bad toll trunk" and that they fixed the problem.

6. The Nebraska PSC Staff made inquiries with Qwest about our complaint. Qwest informed them that "they have found a bad toll trunk," that the problem had nothing to do with least-cost routing, and that it is not Qwest practice to route wireline toll calls through wireless carriers. A copy of the email from the Nebraska PSC that reports Qwest's response to me is appended to this Affidavit.

7. I have discussed this matter with friends who live in Nebraska and they have experienced the same types of calls – significant call quality degradation and wireless numbers that display on their Caller ID. From my personal experience, and from these discussions with friends, I do not believe that what I experienced is an isolated instance.

8. I am not a network engineer, and so I do not know the specifics of how Qwest could have routed its calls to cause such poor quality and to show a wireless number on Caller ID.

9. However, I am a telecom professional, and I believe that Qwest would stand to benefit by routing intrastate wireline toll calls through a wireless carrier. It is my understanding that local exchange carriers in many cases cannot bill or collect access charges from wireless carriers, such as T-Mobile. I therefore believe that, if Qwest did route intrastate wireline toll calls through a wireless carrier, it might evade paying otherwise applicable access charges.
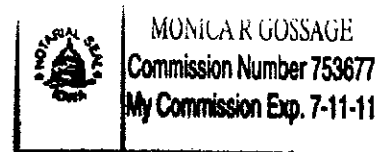

I solemnly affirm under the penalties of perjury, pursuant to 18 U.S.C. § 1621, and upon personal knowledge that the contents of the foregoing paper are true.

Bradley Chapman
Bradley Chapman

Sworn to before me this _3Ist_ day of March, 2011.

Monica R Gossage
Notary Public

My Commission expires: _7 - 11 - 11_

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----- Forwarded Message ----
From: brad chapman <brad32_91@yahoo.com>
To: "Elton, Cheryl" <cheryl.elton@nebraska.gov>
Sent: Wed, April 7, 2010 1:48:16 PM
Subject: Re: Qwest complaint

Cheryl,

Thank you for your response. I was also contacted by Qwest and told the same thing. The fact that the number that came up on the other end of our call was a T-mobile number was strange. The technician told my wife that is what they were doing. My wife was on the phone with them off and on during the day and not until she told them we filed a complaint did they get anyting done. Once she told them that, they transferred her to the routing department and they got it fixed. I have visited with people from other telephone companies and they have seen the same issues with Qwest and changing numbers.

I thank you for listening to my complaint and happy we have our end resolved.

From: "Elton, Cheryl" <cheryl.elton@nebraska.gov>
To: "brad32_91@yahoo.com" <brad32_91@yahoo.com>
Sent: Wed, April 7, 2010 1:30:01 PM
Subject: Qwest complaint

Brad,

Thank you for contacting the Nebraska Public Service Commission regarding your issues with calling certain people in Northeast Nebraska Telephone Company service area. I have contacted Qwest and find the following:

Qwest states that they have found a bad toll trunk that resulted in the service problem that you identified. It has been corrected and service restored. This particular problem has nothing to do with least-cost routing and the practice described by NNTC. Qwest states that this is not a Qwest practice.

If you have any further questions, please feel free to contact me.

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